



Wilson Sonsini Goodrich & Rosati  
Professional Corporation

1301 Avenue of the Americas  
40th Floor  
New York, New York 10019-6022

O: 212.999.5800  
F: 212.999.5899

December 21, 2021

**VIA CM/ECF**

The Honorable LaShann DeArcy Hall  
United States District Judge  
Eastern District of New York  
225 Caman Plaza East  
Brooklyn, New York 11201

Re: United States v. Alam, No. 1:19-cr-00280-LDH-RML

Dear Judge DeArcy Hall:

We represent Mr. Ashiqul Alam in the above-referenced case. We write to respectfully request an expedited sentencing for Mr. Alam for the reasons stated below. In connection with this request, Mr. Alam consents to waiving the presentence investigation and report ("PSR") prior to sentencing, given the nature of his plea agreement.

As your Honor may already be aware, on December 17, 2021, pursuant to a plea agreement (the "Plea Agreement"), Mr. Alam pleaded guilty to Count One of the above-captioned indictment, charging him with a violation of 18 U.S.C. § 922(k) (Possession of a Firearm with an Obliterated Serial Number), in front of Magistrate Judge Robert M. Levy. In relevant part, the Plea Agreement provides that, pursuant to Rule 11(c)(1)(C) of the Federal Rules of Criminal Procedure, the United States Attorney's Office for the Eastern District of New York (the "Office") and Mr. Alam agree that a sentence of 60 months' imprisonment—which is the maximum permissible sentence for this charge—and a supervised release term of 3 years is the appropriate sentence in this matter. The Plea Agreement further provides that the Office will not bring further criminal charges against Mr. Alam in connection with the conduct at issue in this case.

Mr. Alam is currently detained at the Metropolitan Detention Center ("MDC") in Brooklyn, where living conditions have gotten substantially worse since the COVID-19 pandemic. Furthermore, the Probation Office has alerted us that, currently, a PSR can take as long as six months to be prepared. Mr. Alam, therefore, respectfully requests that his sentencing be expedited so that he may be designated to a facility as soon as possible to serve the remainder of his sentence. Given Mr. Alam's current living conditions and the agreed-upon sentence in the Plea Agreement, Mr. Alam is prepared to waive the PSR.

**WILSON  
SONSINI**

The Honorable LaShann DeArcy Hall  
December 21, 2021  
Page 2

The government does not object to this request. Should the Court deem it useful to have the PSR for purposes of sentencing, however, we would of course defer to the Court's wishes.

Thank you in advance for the Court's consideration.

Respectfully submitted,

WILSON SONSINI GOODRICH & ROSATI  
Professional Corporation

s/ Morris J. Fodeman  
Morris J. Fodeman

*Counsel for Defendant Ashiqul Alam*

cc: All Counsel of Record (via CM/ECF)